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11 Attorney for Defendant Michael Vannak Khem Misiewicz  
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13 UNITED STATES DISTRICT COURT  
14 SOUTHERN DISTRICT OF CALIFORNIA  
15 (HONORABLE JANIS L. SAMMARTINO)

16 UNITED STATES OF AMERICA,	)	Criminal No.13CR03782
	)	
17	)	
Plaintiff,	)	Date: March 27, 2015
	)	Time: 2:00 p.m.
18 v.	)	
19	)	NOTICE OF MOTIONS AND
MICHAEL VANNAK KHEM MISIEWICZ,	)	MOTIONS:
	)	
20 Defendant.	)	1) DEFENDANTS AMENDED REQUEST
	)	FOR DISCOVERY; AND
21	)	
	)	2) FOR LEAVE TO FILE FURTHER
22	)	MOTIONS
23	)	

24 TO: LAURA E. DUFFY, UNITED STATES ATTORNEY;  
25 ROBERT HUIE, ASSISTANT UNITED STATES ATTORNEY; AND  
MARK PLETCHER, ASSISTANT UNITED STATES ATTORNEY

26  
27 PLEASE TAKE NOTICE that on Friday March 27, 2015 at 2:00  
28 p.m., or as soon thereafter as counsel may be heard, the defendant,  
Michael Vannak Khem Misiewicz, by and through his attorneys Mark F.

1 Adams and Wendy S. Gerboth, will ask this Court to enter an order  
2 granting the motions listed below.

3 **MOTIONS**

4 Michael Vannak Khem Misiewicz, the defendant in this case, by  
5 and through his attorney, Wendy S. Gerboth, pursuant to the U.S.  
6 Const., Fed. R. Crim. P., Fed. R. Evid., and all other applicable  
7 statutes, case law and local rules, hereby moves this Court for an  
8 order:

- 9 (1) compelling further discovery; and  
10 (2) granting leave to file further motions.

11 These motions are based upon the instant motions and notice  
12 of motions, the attached statement of facts and memorandum of points  
13 and authorities, and any and all other materials that may come to this  
14 Court's attention at the time of the hearing on these motions.

15 Respectfully submitted,

16 Dated: March 13, 2015

/S/ Mark F. Adams  
Mark F. Adams

18  
19 Dated: March 13, 2015

/S/ Wendy S. Gerboth  
Wendy S. Gerboth

20 Attorneys for Defendant Michael  
21 Vannak Khem Misiewicz  
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